

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SYNCA DIRECT, INC.,

Plaintiff and Counterclaim-Defendant,

-against-

MULTIMEDIA DENTAL SYSTEMS, INC.,

Defendant and Counterclaim Plaintiff,

-against-

SYNCA and JOHN DOES 1-5,

Additional Counterclaim-Defendants.  
-----X

Case No. 07-CV-6030 (WHP)(GWG)

**AFFIDAVIT OF ROBERT SCOTT  
McLAUGHLIN IN SUPPORT OF  
DEFENDANT AND COUNTER-  
CLAIM-PLAINTIFF MULTIMEDIA  
DENTAL SYSTEMS, INC.'S  
MOTION FOR CONTEMPT**

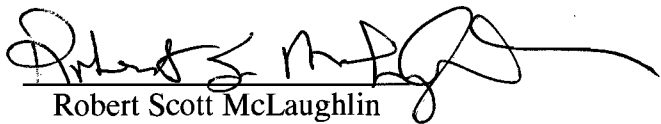
ROBERT SCOTT McLAUGHLIN, being duly sworn, deposes and says:

1. I am the President of the Defendant and Counterclaim-Plaintiff, Multimedia Dental Systems, Inc. ("MMD").
2. I make this affidavit in support of MMD's motion seeking to hold the Plaintiff and Counterclaim-Defendant, Synca Direct, Inc. ("Synca"), in contempt of the Preliminary Injunction Order, issued in this action on January 31, 2007.
3. MMD provides a number of products to the dental profession, including MediaDent Dental Imaging v.4.5 software ("MediaDent D.I."), a digital x-ray and dental imaging software solution.
4. MMD holds a certificate of copyright for MediaDent D.I. under registration number TX-6-159-013.
5. MMD presently sells MediaDent D.I. nationally and internationally.
6. MediaDent D.I. is an extremely valuable and profitable product for MMD.

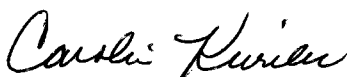
7. MMD has discovered that Synca is actively offering for sale, advertising, promoting and displaying the CADI v.4 software on its website, <http://www.synca.com/>.

8. I respectfully request that the Court immediately halt Synca's infringing activities and blatant violation of the Preliminary Injunction Order so as to prevent further injury to MMD's business.

9. MMD has not made a previous application for similar relief.

  
Robert Scott McLaughlin

Sworn to before me this 14  
day of December, 2007.

  
Notary Public

MY COMMISSION EXPIRES  
AUGUST 3, 2008